

Closed

County Lowry and Clark
Facility & # City of Helena #99
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GW Monitoring O & M
GW Reports Run-on
Inspections
Other: _____

DATA VALIDATION AND STATISTICAL EVALUATION OF DECEMBER 2011 GROUNDWATER QUALITY DATA

CITY OF HELENA LANDFILL

Prepared For:

CITY OF HELENA
HELENA, MONTANA



Hydrometrics, Inc.
consulting scientists and engineers

FEBRUARY 2012

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**DEPT. OF ENVIRO. QUALITY
WASTE & UNDERGROUND TANK
MANAGEMENT BUREAU**

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Hydrometrics, Inc.
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February 28, 2012

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DEPT. OF ENVIRO. QUALITY
WASTE & UNDERGROUND TANK
MANAGEMENT BUREAU

Mr. Martin Van Oort
Environmental Science Specialist
Solid Waste Regulatory Program
Montana Department of Environmental Quality
P.O. Box 200901
Helena, MT 59620-0901

RE: Statistical Evaluation of December 2011 Groundwater Quality Data

Dear Martin,

On behalf of the City of Helena, Hydrometrics validated and statistically evaluated groundwater quality data for samples collected at the City's municipal landfill in December 2011. After receiving approval from Pete Anderson of the City of Helena, I am forwarding a copy of the report "Data Validation and Statistical Evaluation of December 2011 Groundwater Quality Data City of Helena Landfill" for your review.

If you have any questions concerning this report, please don't hesitate to call.

Sincerely,

Jodi Bingham, P.E.
Environmental Engineer/Chemist

Enclosure

c: John Rundquist, City of Helena, without Enclosure
Pete Anderson, City of Helena, without Enclosure
Mike Wignot, Hydrometrics, without Enclosure

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**DATA VALIDATION AND STATISTICAL
EVALUATION OF DECEMBER 2011
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DEPT. OF ENVIRO. QUALITY
WASTE & UNDERGROUND TANK
MANAGEMENT BUREAU

CITY OF HELENA LANDFILL

Prepared for:

Mr. John Rundquist
City of Helena
City/County Building
316 North Park Avenue
Helena, MT 59623

Prepared by:

Hydrometrics, Inc.
3020 Bozeman Avenue
Helena, MT 59601

February 2012

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**DATA VALIDATION AND STATISTICAL
EVALUATION OF DECEMBER 2011
GROUNDWATER QUALITY DATA
CITY OF HELENA LANDFILL**

1. REPORT OBJECTIVES

This report is prepared on behalf of the City of Helena Landfill to fulfill the groundwater data evaluation requirements provided in Administrative Rules, Montana (ARM) Title 17, Chapter 50. This report provides analytical results for groundwater samples collected at monitoring wells during the December 2011 monitoring event, summarizes, the data validation results and statistically evaluates the data. The samples were collected and analyzed in accordance with the Montana Department of Environmental Quality (MDEQ) approved sampling and analysis plan (Hydrometrics, 2008).

ARM 17.50.1305(8) and ARM 17.50.1305(9) stipulate the types of statistical data evaluations to be performed on groundwater quality monitoring data from regulated landfills. Federal guidance on conducting statistical evaluations of groundwater data is also available (EPA, 1989; EPA, 1992). These regulations and guidance documents allow the use of a wide range of statistical procedures including: parametric analysis of variance, non-parametric analysis of variance, tolerance or prediction interval testing, trend tests, or other statistical tests meeting the statistical testing objectives of the rules.

Statistical evaluations have been performed for this site semiannually since 1993 and the following conclusions have been reached based on the results of those evaluations:

- Chlorinated hydrocarbons occur downgradient of the landfill;
- Tetrachloroethene (PCE) is the chlorinated organic compound of greatest concern due to Maximum Contaminant Level (MCL) exceedances;

- Concentrations of PCE are decreasing over time in well EPA-1, the well that has historically shown the highest concentrations, and in compliance wells HL-90-1, HL-99-1, HL-99-2, and HL-99-3; and
- Elevated nitrate plus nitrite as N (nitrate) concentrations exist both upgradient and downgradient of the landfill at similar levels.

These findings are further evaluated in this December 2011 statistical report through an assessment of current concentrations (Table 4-1), a comparison of summary statistics (Tables 4-2 and 4-3), an inter-well prediction analysis (Table 4-4), and an examination of temporal trends (Table 4-5 and Figures 4-1 and 4-2).

2.2 WELL LOCATIONS

Program monitoring wells located around the landfill were included in the December 2011 groundwater monitoring program and are categorized as follows:

- Background wells: HL-06-1, HL-84-1, HL-91-2, MPC-2;
- Downgradient wells: HL-09-1, HL-09-1, HL-99-1, HL-99-2, HL-99-3, MPC-1, MPC-2, EPA-1, HL-99-1, HL-99-2, HL-99-3; and
- Compliance well: HL-94.

As discussed in Section 3 and in accordance with the approved sampling and analysis plan (Hydroscience, 2008), eight of these wells were sampled during the December sampling event. The locations of these wells are shown in Figure 2-2.

2. SITE DESCRIPTION

2.1 PHYSICAL FEATURES

A site location map is provided in Figure 2-1. The landfill is surrounded for several miles in all directions by residential, commercial and industrial zoned property. There are several businesses upgradient of the landfill, which have the potential to affect groundwater quality in the area.

A site plan is shown on Figure 2-2. The landfill is divided into three sections. The southern part of the landfill (Phase I and Phase II sections) is unlined and was in operation until the early 1980s. The northern part of the landfill (Phase III) is also unlined, and was in operation until November 1993. The Phase III landfill was capped with an 18-inch clay cover to minimize surface water percolation through the landfill and subsequent migration of chemicals into groundwater.

2.2 WELL LOCATIONS

Fourteen monitoring wells located around the landfill were included in the December 2011 groundwater monitoring program and are characterized as follows:

- Background wells: HL-06-1, HL-94-1R, HL-94-2R, MPC-5;
- Downgradient wells: HL-10-1, HL-90-1, HL-90-2, HL-90-3, MPC-1, MPC-2, EPA-1, HL-99-1, HL-99-2, HL-99-3; and
- Cross-gradient well: HL-94-3.

As discussed in Section 3 and in accordance with the approved sampling and analysis plan (Hydrometrics, 2008), eight of these wells were sampled during the December sampling event. The locations of these wells are shown in Figure 2-2.



NO SCALE

LANDFILL
LOCATION

CITY OF HELENA LANDFILL
DATA VALIDATION & STATISTICAL
EVALUATION OF DECEMBER 2011
GROUNDWATER QUALITY DATA

VICINITY MAP

FIGURE

2-1



SITE CODE	DTWL	MPE	SWL
Dec-11			
HL-06-1	15.07	3993.62	3978.55
82-3	64.95	3973.51	3908.56
EPA-1	45.08	3981.08	3936.00
EPA-4	No Access	3973.83	
HL-10-1	54.23	3943.01	3888.78
HL-90-1	53.52	3942.48	3888.96
HL-90-2	45.28	3950.96	3905.68
HL-90-3	57.91	3958.29	3900.38
HL-94-1R	55.55	3994.04	3938.49
HL-94-2R	36.50	3967.64	3931.14
HL-94-3	34.48	3967.38	3932.90
HL-99-1	53.38	3943.15	3889.77
HL-99-2	54.41	3945.75	3891.34
HL-99-3	50.19	3948.05	3897.86
INF. GALLE	5.46	3918.89	3913.43
I-1	63.05	3899.59	3836.54
MPC-1	22.16	3946.08	3923.92
MPC-2	16.89	3936.09	3919.20
MPC-5	52.33	3990.14	3937.81



SCALE

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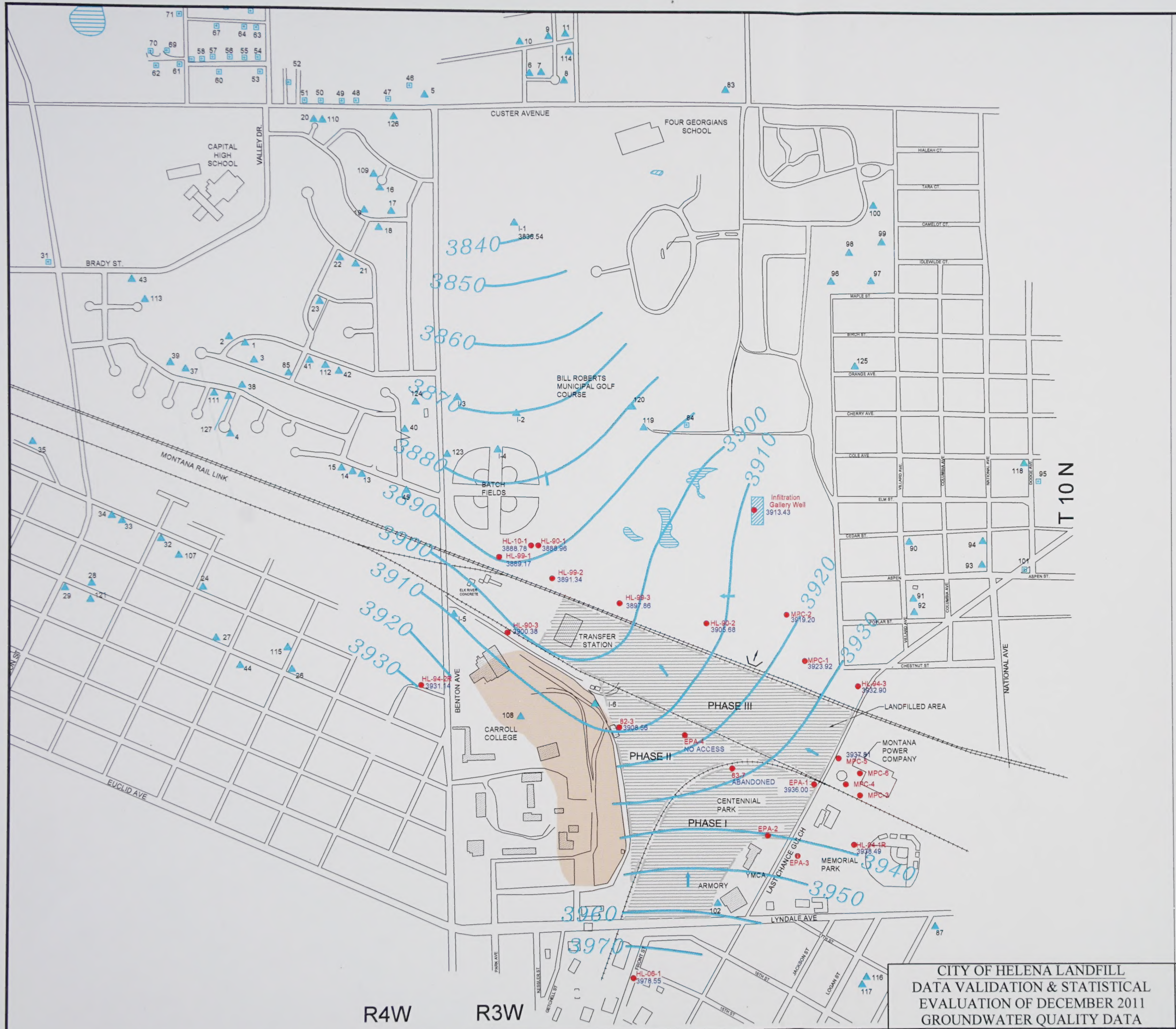
LEGEND

- HL-1 ■ PIEZOMETER
- 83-6 ● MONITORING WELL
- I-6 ▲ IRRIGATION WELL
- 80 □ DOMESTIC WELL
- INFILTRATION GALLERY (GROUNDWATER COLLECTION SYSTEM)
- AREA OF SHALLOW LOW PERMEABILITY BEDROCK
- POTENTIOMETRIC CONTOUR LINE
- INFERRED GROUNDWATER FLOW DIRECTION
- STORM WATER OUTFALL FOR LAST CHANCE GULCH

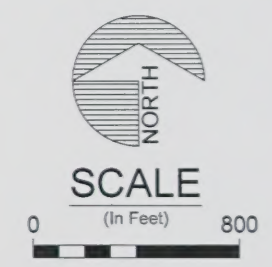
UDY AREA AND DECEMBER 2011
POTENTIOMETRIC SURFACE

FIGURE

2-2



SITE CODE	DTWL	MPE	SWL
Dec-11			
HL-06-1	15.07	3993.62	3978.55
82-3	64.95	3973.51	3908.56
EPA-1	45.08	3981.08	3936.00
EPA-4	No Access	3973.83	
HL-10-1	54.23	3943.01	3888.78
HL-90-1	53.52	3942.48	3888.96
HL-90-2	45.28	3950.96	3905.68
HL-90-3	57.91	3958.29	3900.38
HL-94-1R	55.55	3994.04	3938.49
HL-94-2R	36.50	3967.64	3931.14
HL-94-3	34.48	3967.38	3932.90
HL-99-1	53.38	3943.15	3889.77
HL-99-2	54.41	3945.75	3891.34
HL-99-3	50.19	3948.05	3897.86
INF. GALLE	5.46	3918.89	3913.43
I-1	63.05	3899.59	3836.54
MPC-1	22.16	3946.08	3923.92
MPC-2	16.89	3936.09	3919.20
MPC-5	52.33	3990.14	3937.81



- LEGEND**
- HL-1 ■ PIEZOMETER
 - 83-6 ● MONITORING WELL
 - I-6 ▲ IRRIGATION WELL
 - 80 □ DOMESTIC WELL
 - INFILTRATION GALLERY (GROUNDWATER COLLECTION SYSTEM)
 - AREA OF SHALLOW LOW PERMEABILITY BEDROCK
 - 3900 — POTENTIOMETRIC CONTOUR LINE
 - INFERRED GROUNDWATER FLOW DIRECTION
 - ↘ STORM WATER OUTFALL FOR LAST CHANCE GULCH

CITY OF HELENA LANDFILL
DATA VALIDATION & STATISTICAL
EVALUATION OF DECEMBER 2011
GROUNDWATER QUALITY DATA

STUDY AREA AND DECEMBER 2011
POTENTIOMETRIC SURFACE

FIGURE
2-2

2.3 GROUNDWATER FLOW DIRECTION AND VELOCITY

Figure 2-2 shows water level elevations observed in December 2011 and groundwater potentiometric surface contours. Groundwater flow direction is also shown on this figure. The general groundwater flow direction in the vicinity of the landfill is to the north-northwest. The potentiometric surface in the area of well HL-94-3 suggests that groundwater flows to the west northwest (Figure 2-2); thus, well HL-94-3 is not considered to be upgradient or downgradient of the landfill. Well HL-94-3 has, therefore, been designated as a “cross-gradient” well.

Table 2-1 shows the groundwater velocities calculated for each of the monitoring wells sampled during the December 2011 sampling event. Slope was determined from the potentiometric contours shown in Figure 2-2. The hydraulic conductivities were obtained from the groundwater flow model inputs included in the report “Evaluation of Groundwater Extraction Remediation Alternative at the Helena Landfill” (Hydrometrics, 1999a). The porosity for each well was assumed to be 0.25. An average regional gradient of 0.0237 ft/ft was determined between monitoring well HL-06-1 and I-1. This yields an average regional velocity of 0.770 ft/day.

TABLE 2-1. GROUNDWATER VELOCITIES

Well	Hydraulic Conductivity (ft/day)	Slope (ft/ft)	Velocity (ft/day)
HL-06-1	0.03	0.0357	0.00428
HL-10-1	20	0.0167	1.33
HL-90-1	20	0.0167	1.33
HL-94-2R	0.28	0.0295	0.0330
HL-99-1	10	0.0345	1.38
HL-99-2	20	0.0142	1.13
HL-99-3	20	0.0205	1.63
MPC-5	2.8	0.0210	0.235

2.4 CURRENT ACTIVITIES

New modifications to Centennial Park, located over the old landfill, began in June 2010 and continued through the end of the summer of 2012. Construction work included the installation of fill material and some utilities, planting of new grass and trees, and the installation of a new automatic watering system and other park facilities. All modifications to the park were reviewed to ensure the integrity of the landfill cap would be maintained and that the final design would be even more protective of human health and the environment than the current design. All plans were submitted to MDEQ prior to construction. Every effort was made to preserve the existing monitoring wells and the corrective measures previously implemented.

Well EPA-1 was damaged during construction activities in the Spring of 2011. During the June 2011 sampling event, it was noted that although water level measurements could be taken, a bailer would no longer drop to the static water level of the well. Later, personnel from Hydrometrics and Helena Sand and Gravel were able to repair the well and the use of a bailer is again possible. This well was sampled again during the December 2011 sampling event.

The water samples collected for the City of Helena Landfill in December 2011 have been validated by the Hydrometrics Data Validation Department in accordance with the project work plan, "Ground Sampling and Analysis Plan, City of Helena Landfill, Groundwater, Surface Water and Landfill Gas Monitoring Activities" (Hydrometrics, 2005). It was noted by the lab that upon receipt of the samples, sample HL-1112-100 did not have a collection time on the sample container and the water was taken from after a headspace had formed in the container and additional sulfuric acid was added to the sample bottle for sample HL-1112-100 to achieve the correct preservation requirement of pH<2. Lab and field quality control procedures were appropriate; quality control (QC) samples included a field duplicate, a DI blank, a trip blank, a reagent blank, and standard internal laboratory QC samples. No

3. SUMMARY OF DECEMBER 2011 DATA VALIDATION REPORT

Eight monitoring wells around the landfill and two domestic wells were included in the December 2011 sampling event. Static water levels (SWL) were obtained from eight additional monitoring wells, one irrigation well, and the infiltration gallery. The December 2011 monitoring sites for the City of Helena Landfill include the following:

- Monitoring wells 82-3 (SWL only), EPA-1 (SWL only), HL-06-1, HL-10-1, HL-90-1, HL-90-2 (SWL only), HL-90-3 (SWL only), HL-94-1R (SWL only), HL-94-2R, HL-94-3 (SWL only), HL-99-1, HL-99-2, HL-99-3, MPC-1 (SWL only), MPC-2 (SWL only), MPC-5;
- Irrigation wells I-1 (SWL only);
- Domestic wells 5, 16; and
- The infiltration gallery (SWL only).

The December analytical parameters included metals, volatile organics, semi-volatile organics, halogenated organics, and major anions for all the monitoring wells and volatile organics, semi-volatile organics, and halogenated organics for all domestic wells as specified in the approved sampling and analysis plan (Hydrometrics, 2008).

The water samples collected for the City of Helena Landfill in December 2011 have been validated by the Hydrometrics Data Validation Department in accordance with the project work plan, "Revised Sampling and Analysis Plan, City of Helena Landfill, Groundwater, Surface Water and Landfill Gas Monitoring Activities" (Hydrometrics, 2008). It was noted by the lab that upon receipt of the samples, sample HL-1112-200 did not have a collection time on the sample containers and the time was taken from other submitted documentation; and additional sulfuric acid was added to the nitrate bottle for sample HL-1112-109 to achieve the correct preservation requirement of pH<2. Lab and field quality control procedures were appropriate; quality control (QC) samples included a field duplicate, a D.I. blank, a trip blank, a rinsate blank, and standard internal laboratory QC samples. No

parameters were reported as above the reporting limit in the D.I. blank or trip blank; however, the rinsate blank had an exceedance of chloroform resulting in one associated result being flagged. All field duplicate pair relative percent differences were within the required control limits. The entire data validation report is included as Appendix A of this report. Overall, the City of Helena Landfill data for December 2011 were deemed acceptable for the purposes of the project as outlined in the work plan.

1. Comparison of applicable water quality criteria and standards with the "background" water quality with summary statistics of downgradient monitoring for December 2011 and all samples to date;
2. Inter-well gradient interval analysis;
3. Trend analysis; and
4. Temporal concentration plots.

The first three analyses include all those parameters for which results were reported above the detection limit in any of the monitoring wells for the December 2011 sampling event. The fourth evaluation, temporal concentration plots, was performed for PCE and chloroform, the only constituents that currently exceed their regulatory limits in downgradient wells. Data from all wells sampled during the December 2011 sampling event, which have historically shown PCE results above the detection limit of 0.001 mg/L and chloroform results above the MCL of 10 mg/L, or with potentially increasing trends, were evaluated.

4.1 DOWNGRADIENT WATER QUALITY COMPARISONS WITH CRITERIA AND UPGRADEMENT WATER QUALITY

The following comparisons are derived from the December 2011 data and summary statistics in Tables 4-1, 4-2, and 4-3:

- (a) For the December 2011 sampling event (Table 4-1 and 4-2) the following parameters were detected only in background (also called upgradient) wells: Nickel, 1,1,1-trichloroethane, benzene, bromo-dichloromethane, o-xylene, m,p-xylene and total xylene.

4. STATISTICAL DATA EVALUATION AND COMPARISON

Four types of data evaluations were conducted using the December 2011 sample results for the monitoring wells around the landfill. The domestic wells are evaluated separately in Section 5. The four types of data evaluations conducted are:

1. Comparisons of applicable water quality criteria and upgradient (also called “background”) water quality with summary statistics of downgradient concentrations for December 2011 and all samples to date;
2. Inter-well prediction interval analysis;
3. Trend analysis; and
4. Temporal concentration plots.

The first three analyses include all those parameters for which results were reported above the detection limit in any of the monitoring wells for the December 2011 sampling event. The fourth evaluation, temporal concentration plots, was performed for PCE and nitrate; the only constituents that currently exceed their regulatory limits in downgradient wells. Data from all wells sampled during the December 2011 sampling event, which have historically shown PCE results above the detection limit of 0.001 mg/L and nitrate results above the MCL of 10 mg/L or with potentially increasing trends, were evaluated.

4.1 DOWNGRAIENT WATER QUALITY COMPARISONS WITH CRITERIA AND UPGRADIENT WATER QUALITY

The following conclusions are derived from the December 2011 data and summary statistics in Tables 4-1, 4-2, and 4-3:

- (a) For the December 2011 sampling event (Tables 4-1 and 4-2), the following parameters were detected only in background (also called upgradient) wells: nickel, 1,1,1-trichloroethane, benzene, bromodichloromethane, o-xylenes, m+p xylenes and total xylenes.

**TABLE 4-1. SUMMARY OF PARAMETER CONCENTRATIONS IN LANDFILL MONITORING WELLS
FOR THE DECEMBER 2011 MONITORING EVENT**

Parameter	Downgradient Wells					Upgradient Wells			MCL ⁽¹⁾
	HL-10-1	HL-90-1	HL-99-1	HL-99-2	HL-99-3	HL-06-1	MPC-5	HL-94-1R	
pH (s.u.)	7.0	7.5	7.3	7.4	7.9	7	7.1	7.6	NA
Specific Conductance (µmhos/cm)	1230	1100	1060	796	779	961	2170	768	NA
Sulfate	130	120	150	120	150	180	440	76	NA
Chloride	190	140	97	47	51	50	23	27	NA
Nitrate+Nitrite as N	8.9	8.8	9.4	6.6	8.3	8.9	12.3	0.55	10
Arsenic (Dissolved)	<0.005	<0.005	<0.005	<0.005	0.005	<0.005	<0.005	<0.005	0.010
Iron (Dissolved)	<0.03	<0.03	0.07	0.10	0.29	<0.03	1.51	<0.03	0.3 ⁽²⁾
Nickel (Dissolved)	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0.02	<0.01	0.1
Zinc (Dissolved)	<0.01	<0.01	0.01	0.02	0.01	<0.01	<0.01	<0.01	2
1,1,1-Trichloroethane	<0.001	<0.001	<0.001	<0.001	<0.001	0.0024	<0.001	<0.001	0.2
1,1-Dichloroethane	0.0019	0.0017	<0.001	0.0024	0.0011	<0.001	<0.001	<0.001	NA
Benzene	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.037	<0.001	0.005
Bromodichloromethane	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.0027	0.010
Chloroform	<0.001	<0.001	0.0021	0.0015	0.0019	0.0035	<0.001	0.018	0.07
Cis-1,2-Dichloroethene	0.0016	0.0013	0.0016	<0.001	<0.001	<0.001	<0.001	<0.001	0.07
Dichlorodifluoromethane	0.0016	<0.001	<0.001	0.0015	<0.001	<0.001	<0.001	<0.001	1
Tetrachloroethene (PCE)	0.0064	0.0057	0.0035	0.0049	0.0037	<0.001	<0.001	<0.001	0.005
Trichloroethene (TCE)	0.0014	0.0012	<0.001	0.0011	<0.001	<0.001	<0.001	<0.001	0.005
o-Xylene	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.0035	<0.001	10 ⁽³⁾
m+p Xylene	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.011	<0.001	10 ⁽³⁾
Total Xylenes	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	0.015	<0.001	10
Cyanide (Total)	<0.005	<0.005	<0.005	0.007	0.033	<0.005	5.05	<0.005	0.2
Chemical Oxygen Demand (COD)	1	2	1	<1	2	<1	26	4	NA

Concentrations are in mg/L, except as indicated.

NM = not measured

(1) Primary Maximum Contaminant Levels promulgated under the Safe Drinking Water Act for protection of public drinking water supplies.

NA indicates no MCL has been promulgated.

(2) Secondary Maximum Contaminant Level based on aesthetic properties such as taste, odor, and staining.

(3) MCL is for total xylenes.

Values in **bold** exceed the MCL.

**TABLE 4-2. COMPARISON OF DOWNGRAIDENT CONCENTRATIONS WITH BACKGROUND CONCENTRATIONS
AND MCLs FOR THE DECEMBER 2011 SAMPLING EVENT**

Parameter	December 2011 Downgradient Well Concentrations (mg/L) ⁽¹⁾						Comparison Values (mg/L)				
	D.F. ⁽³⁾	Min.	Mean ⁽⁴⁾	Median	Max.	Max. Location	Background / Upgradient Wells ⁽²⁾				MCL ⁽⁵⁾
							D.F. ⁽³⁾	Mean ⁽⁴⁾	Median	Max.	
pH (s.u.)	5/5	7	7.42	7.4	7.9	HL-99-3	3/3	7.23	7.1	7.6	NA
Specific Conductance (µmhos/cm)	5/5	779	993.0	1060	1230	HL-10-1	3/3	1299.7	961	2170	NA
Sulfate	5/5	120	134.0	130	150	HL-99-1	3/3	232.0	180	440	NA
Chloride	5/5	47	<u>105.0</u>	<u>97</u>	<u>190</u>	HL-10-1	3/3	33.3	27	50	NA
Nitrate+Nitrite as N	5/5	6.6	8.40	8.8	9.4	HL-99-1	3/3	7.25	8.9	12.3	10
Arsenic (Dissolved)	1/5	<0.005	0.005	<0.005	0.005	HL-99-3	0/3	0.0050	<0.005	0.005	0.010
Iron (Dissolved)	3/5	<0.03	0.10	0.070	0.29	HL-99-3	1/3	0.523	<0.03	1.51	0.3 ⁽⁶⁾
Nickel (Dissolved)	0/5	<0.01	<0.01	<0.01	<0.01	NA	1/3	0.013	<0.01	0.02	0.10
Zinc (Dissolved)	3/5	<0.01	<u>0.01</u>	<u>0.010</u>	<u>0.02</u>	HL-99-2	0/3	<0.01	<0.01	<0.01	2
1,1,1-Trichloroethane	0/5	<0.001	<0.001	<0.001	<0.001	NA	1/3	0.0015	<0.001	0.0024	0.2
1,1-Dichloroethane	4/5	<0.001	<u>0.0016</u>	<u>0.0017</u>	<u>0.0024</u>	HL-99-2	0/3	<0.001	<0.001	<0.001	NA
Benzene	0/5	<0.001	<0.001	<0.001	<0.001	NA	1/3	0.013	<0.001	0.037	0.005
Bromodichloromethane	0/5	<0.001	<0.001	<0.001	<0.001	NA	1/3	0.0016	<0.001	0.0027	0.010
Chloroform	3/5	<0.001	0.0015	0.0015	0.0021	HL-99-1	2/3	0.0075	0.0035	0.018	0.07
Cis-1,2-Dichloroethene	3/5	<0.001	<u>0.0013</u>	<u>0.0013</u>	<u>0.0016</u>	HL-99-1	0/3	<0.001	<0.001	<0.001	0.07
Dichlorodifluoromethane	2/5	<0.001	<u>0.0012</u>	<0.001	<u>0.0016</u>	HL-99-2	0/3	<0.001	<0.001	<0.001	1
Tetrachloroethene (PCE)	5/5	<u>0.0032</u>	<u>0.0048</u>	<u>0.0049</u>	0.0064	HL-10-1	0/3	<0.001	<0.001	<0.001	0.005
Trichloroethene (TCE)	3/5	<0.001	<u>0.0011</u>	<u>0.0011</u>	<u>0.0014</u>	HL-10-1	0/3	<0.001	<0.001	<0.001	0.005
o-Xylene	0/5	<0.001	<0.001	<0.001	<0.001	NA	1/3	0.0018	<0.001	0.0035	10 ⁽⁷⁾
m+p Xylene	0/5	<0.001	<0.001	<0.001	<0.001	NA	1/3	0.0043	<0.001	0.011	10 ⁽⁷⁾
Total Xylenes	0/5	<0.001	<0.001	<0.001	<0.001	NA	1/3	0.0057	<0.001	0.015	10
Cyanide (Total)	2/5	<0.005	0.011	<0.005	0.033	HL-99-3	1/3	1.69	<0.005	5.1	0.2
Chemical Oxygen Demand (COD)	4/5	<1	1.4	1	2	HL-90-1	2/3	10.3	4	26	NA

(1) Downgradient wells are: HL-10-1, HL-90-1, HL-99-1, HL-99-2, HL-99-3.

(2) Background / Upgradient wells are: HL-06-1, MPC-5, HL-94-1R.

(3) Detection frequency (D.F.), i.e. the number of detections over the total number of samples analyzed for that parameter.

(4) Means calculated using the detection limit for non-detected sample results.

(5) Primary Maximum Contaminant Levels promulgated under the Safe Drinking Water Act for protection of public drinking water supplies.

NA indicates no MCL has been promulgated.

(6) Secondary Maximum Contaminant Level based on aesthetic properties such as taste, odor, and staining.

(7) MCL is for total xylenes

Values in **bold** exceed the MCL. Underlined values exceed the maximum background/upgradient concentration.

**TABLE 4-3. COMPARISON OF DOWNGRADIENT CONCENTRATIONS WITH BACKGROUND CONCENTRATIONS
AND MCLs FOR ALL SAMPLING EVENTS TO DATE**

Parameter	Period of Record Downgradient Well Concentrations (mg/L) ⁽¹⁾						Comparison Values (mg/L)				
	D.F. ⁽³⁾	Min.	Mean ⁽⁴⁾	Median	Max.	Max. Location	Background / Upgradient Wells ⁽²⁾				MCL ⁽⁵⁾
							D.F. ⁽³⁾	Mean ⁽⁴⁾	Median	Max.	
pH (s.u.)	112/112	7.0	7.50	7.5	8.0	HL-99-3	96/96	7.41	7.45	8.0	NA
Specific Conductance (µmhos/cm)	110/110	178	958.7	948.5	1400	HL-90-1	93/93	1481.8	937	4170	NA
Sulfate	112/112	15	134.6	131	190	HL-99-1	96/96	336.1	121.5	1980	NA
Chloride	112/112	29	48.9	41	190	HL-10-01	95/96	31.0	25	195	NA
Nitrate+Nitrite as N	106/106	4.75	8.09	8.24	11.1	HL-99-1	91/91	12.48	7.18	73	10
Arsenic (Dissolved)	3/111	<0.005	0.0051	<0.005	0.010	HL-99-3	20/98	0.0055	<0.005	0.037	0.010
Iron (Dissolved)	36/111	<0.03	0.092	<0.03	1.0	HL-99-1	44/96	0.401	<0.03	3.14	0.3 ⁽⁶⁾
Nickel (Dissolved)	0/105	<0.01	<0.01	<0.01	<0.01	NA	20/93	0.011	<0.01	0.05	0.1
Zinc (Dissolved)	14/106	<0.01	0.012	<0.01	<u>0.09</u>	HL-90-1	10/93	0.010	<0.01	0.03	2
1,1,1-Trichloroethane	46/184	<0.001	0.0014	<0.001	<u>0.0074</u>	HL-90-1	14/102	0.0013	<0.001	0.0057	0.2
1,1-Dichloroethane	147/184	<0.001	<u>0.0021</u>	<u>0.002</u>	<u>0.0052</u>	HL-99-3	0/102	<0.001	<0.001	<0.001	NA
Benzene	0/184	<0.001	<0.001	<0.001	<0.002	NA	26/102	0.0058	<0.001	0.077	0.005
Bromodichloromethane	0/184	<0.001	<0.001	<0.001	<0.001	NA	11/102	0.0012	<0.001	0.0048	0.010
Chloroform	171/184	<0.001	0.0024	0.0023	0.0055	HL-90-1	73/102	0.0055	0.0029	0.037	0.07
Cis-1,2-Dichloroethene	57/177	<0.001	<u>0.0012</u>	<0.001	<u>0.0025</u>	HL-99-1	0/97	<0.001	<0.001	<0.001	0.07
Dichlorodifluoromethane	125/184	<0.001	<u>0.0019</u>	<0.001	<u>0.015</u>	HL-90-1	0/102	<0.001	<0.001	<0.001	1
Tetrachloroethene (PCE)	182/184	<0.001	0.0071	0.0060	0.024	HL-99-3	0/102	<0.001	<0.001	<0.001	0.005
Trichloroethene (TCE)	105/184	<0.001	<u>0.0013</u>	<u>0.0011</u>	<u>0.0032</u>	HL-99-3	0/102	<0.001	<0.001	<0.001	0.005
o-Xylene	1/177	<0.001	0.0010	<0.001	0.002	HL-99-1	26/97	0.0039	<0.001	0.033	10 ⁽⁷⁾
m+p Xylene	1/176	<0.001	0.0010	<0.001	0.002	HL-99-2	25/97	0.0035	<0.001	0.025	10 ⁽⁷⁾
Total Xylenes	1/84	<0.001	0.0010	<0.001	0.0013	HL-90-1	8/44	0.0051	<0.001	0.053	10
Cyanide (Total)	42/111	<0.005	0.0150	<0.005	0.4	HL-99-2	28/97	1.44	<0.005	10.9	0.2
Chemical Oxygen Demand (COD)	66/110	<1	2.86	2	25	HL-99-3	71/96	14.0	7	75	NA

(1) Downgradient wells are: HL-10-1, HL-90-1, HL-99-1, HL-99-2, HL-99-3.

(2) Background / Upgradient wells are: 83-6, HL-06-1, MPC-5, HL-94-1R.

(3) Detection frequency (D.F.), i.e. the number of detections over the total number of samples analyzed for that parameter.

(4) Means calculated using the detection limit for non-detected sample results.

(5) Primary Maximum Contaminant Levels promulgated under the Safe Drinking Water Act for protection of public drinking water supplies.

NA indicates no MCL has been promulgated.

(6) Secondary Maximum Contaminant Level based on aesthetic properties such as taste, odor, and staining.

(7) MCL is for total xylenes

Values in **bold** exceed the MCL. Underlined values exceed the maximum background/upgradient concentration.

Parameters detected in only downgradient wells include: arsenic, zinc, 1,1-dichloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, tetrachloroethene (PCE), and trichloroethene (TCE).

- (b) The parameters historically detected only in background wells (Table 4-3) are nickel, benzene and bromodichloromethane. Parameters historically detected only in downgradient wells include: 1,1-dichloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, PCE, and TCE.
- (c) Nitrate, iron, benzene, PCE and cyanide were reported at concentrations exceeding MCL criteria in the December 2011 sampling event (Tables 4-1 and 4-2). The MCLs for nitrate, benzene and cyanide were all exceeded in a single upgradient well (MPC-5); the MCL for PCE was exceeded in two downgradient wells (HL-10-1 and HL-90-1); the secondary MCL (based on aesthetic properties rather than human health standards) for iron was exceeded in a single upgradient well (MPC-5).
- (d) Historically in these wells, nitrate, arsenic, iron, benzene, PCE, and cyanide have been reported at concentrations exceeding MCL criteria (Table 4-3). The MCL for PCE has been exceeded in only downgradient wells; nitrate, iron and cyanide have exceeded their MCLs in both upgradient and downgradient wells; and the MCLs for arsenic and benzene have been exceeded in only upgradient wells.
- (e) Nitrate was detected in all of the December 2011 samples. The MCL of 10.0 mg/L was exceeded in one sample collected in upgradient well MPC-5. Monitoring well MPC-5 showed an increasing trend from 1998 through 2005 reaching a maximum of 73.0 mg/L. Since then, there has been a decrease in the nitrate concentration in this well and is currently at a level of 12.3 mg/L. Discussions with MPC representatives revealed that an attempt to remediate cyanide (from a historic coal gasification plant that was operated just east of the landfill) through oxidation may have inadvertently increased nitrate concentration in area groundwater. This pilot program was shut down when these adverse affects became apparent. However, nitrate levels in downgradient wells have slowly been increasing since that time.
- (f) Metals and arsenic concentrations in groundwater samples have historically been low (typically below laboratory detection limits). Arsenic was detected only in

downgradient well HL-99-3; iron was detected in downgradient wells HL-99-1, HL-99-2 and HL-99-3 and upgradient well MPC-5; nickel was detected only in upgradient well MPC-5; and zinc was detected only in downgradient wells HL-99-1, HL-99-2, and HL-99-3 during December 2011 monitoring (Table 3-1). The detected arsenic and metal concentrations were all at or near their detection limits except for iron in downgradient wells HL-99-2 and HL-99-3 (0.10 mg/L and 0.29 mg/L, respectively) and upgradient well MPC-5 (1.51 mg/L) compared to a detection limit of 0.03 mg/L. Iron exceeded the secondary MCL of 0.3 mg/L (based on aesthetic properties such as taste, odor and staining rather than human health standards) in MPC-5. Iron has historically fluctuated at MPC-5 with concentrations ranging from approximately 0.2 mg/L to 4 mg/L (based on data collected from December 1995 through December 2011).

(g) During the December 2011 sampling event, several volatile organic compounds (VOCs) were detected in samples from downgradient wells, but not in samples from background wells (1,1-dichloroethane, cis-1,2-dichloroethene, dichlorodifluoromethane, PCE, and TCE). PCE was the only VOC to exceed its MCL in downgradient wells (HL-10-1 and HL-90-1). 1,1,1-trichloroethane, benzene, bromodichloromethane, o-xylenes, m+p xylenes and total xylenes were detected only in background wells; benzene was the only VOC to exceed its MCL in upgradient wells (MPC-5). Chloroform was the only VOC detected in samples from both downgradient and background wells. All detections of chloroform were well below the MCL of 0.07 mg/L.

(h) Cyanide was detected in two downgradient wells (HL-99-2 and HL-99-3) and one upgradient well (MPC-5) during the December 2011 sampling event. Both downgradient detections were well below the MCL of 0.2 mg/L; however, upgradient well MPC-5 far exceeded the MCL with a concentration of 5.05 mg/L.

Previous sampling events have shown that cyanide is present at concentrations ranging from approximately 0.77 to 11 mg/L (based on data collected from June 1995 through December 2011) in upgradient well MPC-5. Historically, downgradient

detections of cyanide have been well below the MCL indicating that elevated cyanide levels are not attributable to the Helena Landfill (Table 4-3). As noted previously, a coal gasification plant was historically operated east of the landfill site and could be a source of residual cyanide in groundwater upgradient of the landfill.

4.2 INTER-WELL PREDICTION INTERVAL ANALYSES

Inter-well prediction interval analyses were used to test for statistically significant differences between background and compliance well concentrations for selected parameters (those above the detection limit in any of the monitoring wells for the December 2011 sampling event). Combining all historical data for the background wells, the Shapiro-Francia Test of Normality was performed for each parameter to determine the distribution of the background data. Inter-well parametric prediction intervals were used when the background data were normally or ln-normally distributed. In cases where the background data were not normally or ln-normally distributed, a non-parametric prediction limit was used. All non-detect values were evaluated at one half the detection limit. Results of the prediction interval test are summarized in Table 4-4. Documentation for each of these statistical tests used is included in Appendix B of this report.

As shown on Table 4-4, chloride, 1,1-dichloroethane, cis-1,2-dichloroethane, dichloro-difluoromethane, PCE, and TCE have statistically greater concentrations in downgradient wells than upgradient wells.

4.3 TREND ANALYSIS

In addition to evaluating the chemical concentrations in upgradient and downgradient wells around the landfill for the December 2011 sampling event, it is also important to evaluate concentration trends of key constituents over time. Using the Mann-Kendall test, statistical testing for trends was performed for each downgradient exceedance of its respective inter-well prediction interval as discussed in Section 4.2. All non-detect values were evaluated as zero to prevent the detection of false trends when parameters are detected at concentrations less than the reporting limit or when the reporting limits have changed over time. The results

TABLE 4-4. RESULTS OF INTER-WELL PREDICTION INTERVAL TESTS

Parameter	Background Wells		Downgradient Wells				
	Distribution ⁽¹⁾	Prediction Limit ⁽²⁾	HL-10-1	HL-90-1	HL-99-1	HL-99-2	HL-99-3
pH (s.u.)	Norm (95%)	6.48 - 8.33	7.0	7.5	7.3	7.4	7.9
Specific Conductance (µmhos/cm)	Non-Norm	4114.8	1230	1100	1060	796	779
Sulfate	Non-Norm	1866	130	120	150	120	150
Chloride	Non-Norm	163.7	190	140	97	47	51
Nitrate+Nitrite as N	ln-Norm (99%)	209.8	8.9	8.8	9.4	6.6	8.3
Arsenic (Dissolved)	Non-Norm	0.0079	<0.005	<0.005	<0.005	<0.005	0.005
Iron (Dissolved)	Non-Norm	2.95	<0.03	<0.03	0.07	0.10	0.29
Nickel (Dissolved)	Non-Norm	0.032	<0.01	<0.01	<0.01	<0.01	<0.01
Zinc (Dissolved)	Non-Norm	0.021	<0.01	<0.01	0.01	0.02	0.01
1,1,1-Trichloroethane	Non-Norm	0.0054	<0.001	<0.001	<0.001	<0.001	<0.001
1,1-Dichloroethane	ND	0.001	0.0019	0.0017	<0.001	0.0024	0.0011
Benzene	Non-Norm	0.065	<0.001	<0.001	<0.001	<0.001	<0.001
Bromodichloromethane	Non-Norm	0.0042	<0.001	<0.001	<0.001	<0.001	<0.001
Chloroform	Non-Norm	0.036	<0.001	<0.001	0.0021	0.0015	0.0019
Cis-1,2-Dichloroethene	ND	0.001	0.0016	0.0013	0.0016	<0.001	<0.001
Dichlorodifluoromethane	ND	0.001	0.0016	<0.001	<0.001	0.0015	<0.001
Tetrachloroethene (PCE)	ND	0.001	0.0064	0.0057	0.0035	0.0049	0.0037
Trichloroethene (TCE)	ND	0.001	0.0014	0.0012	<0.001	0.0011	<0.001
o-Xylene	Non-Norm	0.028	<0.001	<0.001	<0.001	<0.001	<0.001
m+p Xylene	Non-Norm	0.024	<0.001	<0.001	<0.001	<0.001	<0.001
Total Xylenes	Non-Norm	0.050	<0.001	<0.001	<0.001	<0.001	<0.001
Cyanide (Total)	Non-Norm	10.6	<0.005	<0.005	<0.005	0.007	0.033
Chemical Oxygen Demand (COD)	Non-Norm	66.5	1	2	1	<1	2

(1) Normality was calculated using the Shapiro-Francia test.

Norm (X%) = data normally distributed at X% level of significance.

ln-Norm (X%) = data ln-normally distributed at X% level of significance.

Non-Norm = data not normally or ln-normally distributed at 95% or 99% level of significance.

ND = all background data below detection limits. Value shown is the detection limit.

(2) Prediction limits calculated as follows:

Normal or ln-normal distribution: parametric prediction interval (99% one-sided, two-sided for pH)

Non-normal distribution: non-parametric prediction interval (99% one-sided, two-sided for pH)

ND: any detectable concentrations in compliance wells are considered significant.

Bold values indicate statistically significant results.

NA - not analyzed

of these analyses are summarized in Table 4-5. Documentation for these statistical tests is included in Appendix B of this report.

TABLE 4-5. RESULTS OF MANN-KENDALL TREND ANALYSES

Parameter	HL-10-1	HL-90-1	HL-99-1	HL-99-2	HL-99-3
Chloride	No Trend				
1,1-Dichloroethane	No Trend	Decreasing		Increasing	No Trend
Cis-1,2-Dichloroethane	No Trend	Increasing	No Trend		
Dichlorodifluoromethane	No Trend			No Trend	
Tetrachloroethene (PCE)	No Trend	Decreasing	Decreasing	No Trend	Decreasing
Trichloroethene (TCE)	No Trend	Decreasing		Increasing	

*Grayed boxes did not have downgradient exceedances of the respective inter-well prediction interval and therefore a trend analysis was not performed.

Chloride and dichlorodifluoromethane are not showing trends in any downgradient well. Cis-1,2-dichloroethane is showing an increasing trend in HL-90-1; according to National Primary Drinking Water Regulations, cis-1,2-dichloroethane is formed as a breakdown product from the reductive dehalogenation of the common industrial solvents TCE and PCE. PCE is showing decreasing trends in downgradient wells. 1,1-Dichloroethane and TCE are showing increasing and decreasing trends in downgradient wells; 1,1-dichloroethane is a breakdown product of 1,1,1-trichloroethane, historically found primarily in wells upgradient of the Helena landfill.

4.4 TEMPORAL CONCENTRATION PLOTS

This report focuses on concentration trends for PCE and nitrate because they are the only constituents regularly exceeding their MCLs in downgradient monitoring wells. PCE was also the focus of the Corrective Measures Assessment for the landfill (Hydrometrics, 1995).

In an attempt to reduce concentrations of PCE in compliance well HL-90-1, the City installed a groundwater extraction system in the spring of 2000 (Hydrometrics, 1999b). This treatment system involves pumping wells HL-99-1, HL-99-2 and HL-99-3 to intercept PCE leaving the landfill, and treating the water to remove VOCs prior to land application on Bill Roberts Golf Course. These wells have been included in groundwater monitoring events along with

compliance well HL-90-1, now replaced by HL-10-1, to evaluate the progress of this new groundwater extraction system.

Trends in PCE concentrations over time for the past ten years for selected monitoring wells are shown on Figure 4-1. PCE concentrations exceeded the MCL value of 0.005 mg/L in monitoring wells HL-10-1 and HL-90-1 for December 2011. Historically, the PCE concentrations in pumping wells HL-99-1, HL-99-2 and HL-99-3 have shown seasonal fluctuations and decreasing trends over the last several years. Compliance well HL-90-1 has shown definite improvement since the installation of the groundwater extraction system in June 2000, averaging 0.0146 mg/L before the extraction system and 0.0072 mg/L after. Due to low water levels in well HL-90-1, this well was replaced with a new well HL-10-1. PCE concentrations in this new well range from 0.006 mg/L to 0.0065 mg/L from June 2010 to the December 2011 sampling event, within historical range of HL-90-1 values and revealed no trend during statistical analysis.

Nitrate concentrations in monitoring wells that have exceeded the MCL of 10 mg/L in the past ten years or are showing an increasing trend are shown on Figure 4-2. The concentrations of nitrate in downgradient wells HL-90-1, HL-99-1 and HL-99-3 have shown slight increasing trends over the last several years; the MCL was exceeded in wells HL-99-1 twice and HL-99-3 once in the last three years. The MCL for nitrate was not exceeded in any downgradient wells during the December 2011 sampling event.

Historically, upgradient wells have shown the highest levels of nitrate in groundwater (Figure 4-2). Upgradient monitoring well MPC-5 showed an increasing trend from 1998 through 2005 reaching a maximum of 73.0 mg/L. Since then, there has been a generally decreasing trend in the nitrate concentration in this well with the December 2011 concentration at 12.3 mg/L. Discussions with MPC representatives revealed that an attempt to remediate cyanide (from a historic coal gasification plant that was operated just east of the landfill) through oxidation may have inadvertently increased nitrate concentrations in area groundwater. This

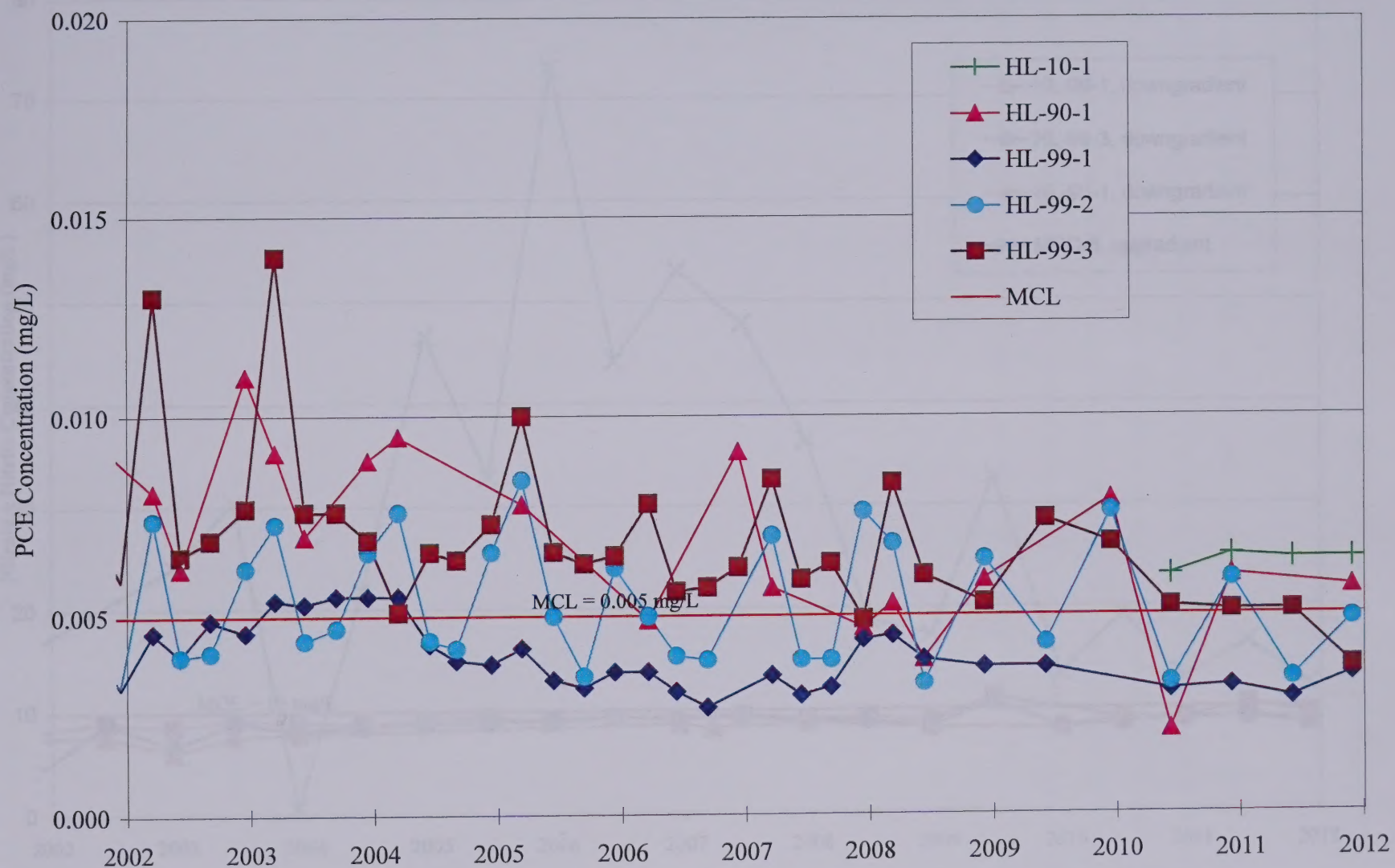


Figure 4-1. Temporal Trends in Tetrachloroethene Concentrations at Selected Monitoring Wells



Figure 4-2. Temporal Trends in Nitrate Concentrations at Selected Monitoring Wells

pilot program was shut down when these adverse affects became apparent; however, nitrate levels are still increasing downgradient of the former coal degasification plant.

In addition to landfill leachate, other potential sources of nitrate in groundwater include historic coal gasification activities east of the landfill and cyanide remediation activities for this site, as well as infiltration of surface runoff containing soluble nitrate fertilizers. Due to the presence of elevated concentrations in both upgradient and downgradient monitoring wells, the effects of the landfill on groundwater nitrate concentrations (relative to other potential sources) are unclear. Trends in nitrate concentrations will continue to be evaluated in future monitoring reports.

5. DOMESTIC WELL DATA EVALUATION

Two domestic wells were also sampled during the December 2011 sampling event. For wells 5 and 16, the only concentrations of VOCs reported above the detection limit were for chloroform and PCE; all detections were below their respective MCLs. Trends in PCE concentrations over the last ten years for the sampled domestic and irrigation wells are shown on Figure 5-1. Both of these wells are used only for irrigation, and residential homes related to these domestic wells have been connected to the City water supply.



Figure 5-1. Long-term Trends in PCE Concentration (mg/L) for Wells 5 and 16

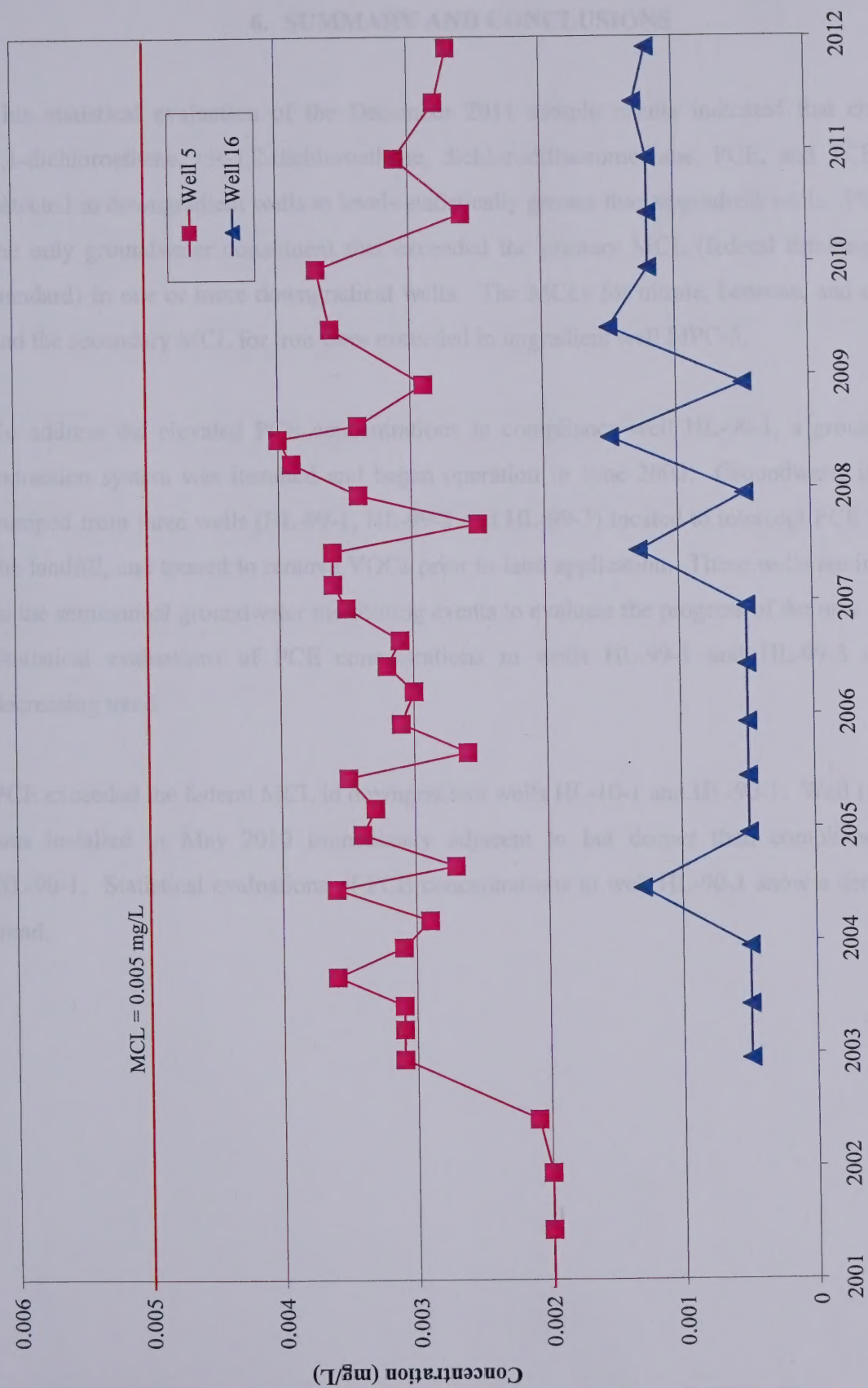


Figure 5-1. Temporal Trends in PCE Concentrations in Domestic and Irrigation Wells

6. SUMMARY AND CONCLUSIONS

This statistical evaluation of the December 2011 sample results indicated that chloride, 1,1-dichloroethene, cis-1,2-dichloroethene, dichlorodifluoromethane, PCE, and TCE were detected in downgradient wells at levels statistically greater than upgradient wells. PCE was the only groundwater constituent that exceeded the primary MCL (federal drinking water standard) in one or more downgradient wells. The MCLs for nitrate, benzene, and cyanide and the secondary MCL for iron were exceeded in upgradient well MPC-5.

To address the elevated PCE concentrations in compliance well HL-90-1, a groundwater extraction system was installed and began operation in June 2000. Groundwater is being pumped from three wells (HL-99-1, HL-99-2 and HL-99-3) located to intercept PCE leaving the landfill, and treated to remove VOCs prior to land application. These wells are included in the semiannual groundwater monitoring events to evaluate the progress of the new system. Statistical evaluations of PCE concentrations in wells HL-99-1 and HL-99-3 show a decreasing trend.

PCE exceeded the federal MCL in downgradient wells HL-10-1 and HL-90-1. Well HL-10-1 was installed in May 2010 immediately adjacent to but deeper than compliance well HL-90-1. Statistical evaluations of PCE concentrations in well HL-90-1 show a decreasing trend.

7. REFERENCES

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DATA VALIDATION REPORT
GROUNDWATER QUALITY DATA
SOUTH COASTAL WATER TREATMENT
PLANT
CITY OF HELONA, ALABAMA

CITY OF HELONA
WATER TREATMENT PLANT

APPENDIX A

DATA VALIDATION REPORT

**DATA VALIDATION REPORT
GROUNDWATER QUALITY DATA
SEMI-ANNUAL SAMPLING
DECEMBER 2011
CITY OF HELENA LANDFILL**

Prepared For:
CITY OF HELENA
HELENA, MONTANA



Hydrometrics, Inc.
consulting scientists and engineers

JANUARY 2012

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DATA VALIDATION REPORT **CITY OF HELENA LANDFILL**

Groundwater Samples Collected in
December 2011
(Semi-Annual Sampling)

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GLOSSARY OF TERMS

CCB	Continuing Calibration Blank
CCV	Continuing Calibration Verification
CLP	Contract Laboratory Program
CRDL	Contract Required Detection Limit
FAA	Flame Atomic Absorption
GFAA	Graphite Furnace Atomic Absorption
HGAA	Hydride Generation Atomic Absorption
ICB	Initial Calibration Blank
ICP	Inductively Coupled Plasma
ICV	Initial Calibration Verification
IDL	Instrument Detection Limit
LCS	Laboratory Control Sample
MSA	Method of Standard Additions
PB	Preparation Blank
PRDL	Project Required Detection Limit
QAPP	Quality Assurance Project Plan
QC	Quality Control
RPD	Relative Percent Difference
RSD	Relative Standard Deviation
SOW	Statement of Work
TDS	Total Dissolved Solids

SUMMARY

Laboratory analysis for groundwater samples collected for the December 2011 sampling event as part of the City of Helena Landfill have been reviewed and validated. This review has been in accordance with the "Revised Sampling and Analysis Plan; City of Helena Landfill; Groundwater, Surface Water, and Landfill Gas Monitoring Activities" (Hydrometrics, March 2008). All samples were analyzed at Energy Laboratories in Helena, Montana.

Data results are qualified when associated field quality control samples have not met validation criteria. Not all quality control deficiencies are equally serious and some may not have any practical impact on the usefulness of the data. A summary of quality control violations found in this validation follows:

Violations involving field quality control samples:

- In the field rinsate blank, HL-1112-104 one exceedance occurred for chloroform resulting in one associated data result being flagged.

Violations involving laboratory quality control samples:

- In the QA/QC Summary Report provided by Energy Laboratories, matrix spike and matrix spike duplicate review showed several exceedances. However, at this level of validation, laboratory exceedances are noted but no flagging of the data occurs.
- It should also be noted that Energy Laboratories raised the reporting limit of sulfate, nitrate + nitrite as n, and cyanide due to sample matrix interference. The reporting limits used for dissolved antimony and thallium were lower than the requested limits, and did not seem to impact the results.
- Energy Laboratories exceeded the holding time for pH for all samples submitted. However, as a rule holding times for laboratory pH measurements are frequently exceeded because measurements are typically not conducted "immediately", but rather as soon as practicable. Therefore, no qualifiers are applied for lab pH holding time exceedances.
- It should be noted that Energy Laboratories used a different method than stated in the work plan on the following parameters: pH, SC, and cyanide. However, no associated

data was flagged because the methods used are considered comparable to stated methods in work plan.

Deviations from the prescribed quality control procedures and/or exceedances of quality control limits have been noted, and results have been flagged in the database. The data quality objectives for accuracy and precision were met, as 99 percent of the field quality control sample results were within control limits and 97 percent of the laboratory quality control samples were within limits. The frequency requirements of 10 percent submittal of blanks, duplicates, control standards and spikes were met. The recommended project completeness goal, acceptance of 90 percent of the results as valid, has also been met as no results have been rejected as a result of this data review. Further discussion of data quality objectives is in Section 12 of the data validation report. All tables are in Appendix 1: data validation codes and definitions are listed in Table 1; a brief summary of flagged data is in Table 2; and a historical comparison is in Table 3. A database printout of this sampling event is located in Appendix 2. The Hydrometrics field notes are in Appendix 3. Energy Laboratories Analytical Reports are located in Appendix 4.

WEL-1	HL-1112-101				
WEL-2	HL-1112-102				
WEL-3	HL-1112-103				
WEL-4	HL-1112-104				
WEL-5	HL-1112-105				
WEL-6	HL-1112-106				
WEL-7	HL-1112-107				
WEL-8	HL-1112-108				
WEL-9	HL-1112-109				
WEL-10	HL-1112-110				
WEL-11	HL-1112-111				
WEL-12	HL-1112-112				
WEL-13	HL-1112-113				
WEL-14	HL-1112-114				
WEL-15	HL-1112-115				
WEL-16	HL-1112-116				
WEL-17	HL-1112-117				
WEL-18	HL-1112-118				
WEL-19	HL-1112-119				
WEL-20	HL-1112-120				
WEL-21	HL-1112-121				
WEL-22	HL-1112-122				
WEL-23	HL-1112-123				
WEL-24	HL-1112-124				
WEL-25	HL-1112-125				
WEL-26	HL-1112-126				
WEL-27	HL-1112-127				
WEL-28	HL-1112-128				
WEL-29	HL-1112-129				
WEL-30	HL-1112-130				
WEL-31	HL-1112-131				
WEL-32	HL-1112-132				
WEL-33	HL-1112-133				
WEL-34	HL-1112-134				
WEL-35	HL-1112-135				
WEL-36	HL-1112-136				
WEL-37	HL-1112-137				
WEL-38	HL-1112-138				
WEL-39	HL-1112-139				
WEL-40	HL-1112-140				
WEL-41	HL-1112-141				
WEL-42	HL-1112-142				
WEL-43	HL-1112-143				
WEL-44	HL-1112-144				
WEL-45	HL-1112-145				
WEL-46	HL-1112-146				
WEL-47	HL-1112-147				
WEL-48	HL-1112-148				
WEL-49	HL-1112-149				
WEL-50	HL-1112-150				
WEL-51	HL-1112-151				
WEL-52	HL-1112-152				
WEL-53	HL-1112-153				
WEL-54	HL-1112-154				
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WEL-60	HL-1112-160				
WEL-61	HL-1112-161				
WEL-62	HL-1112-162				
WEL-63	HL-1112-163				
WEL-64	HL-1112-164				
WEL-65	HL-1112-165				
WEL-66	HL-1112-166				
WEL-67	HL-1112-167				
WEL-68	HL-1112-168				
WEL-69	HL-1112-169				
WEL-70	HL-1112-170				
WEL-71	HL-1112-171				
WEL-72	HL-1112-172				
WEL-73	HL-1112-173				
WEL-74	HL-1112-174				
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WEL-92	HL-1112-192				
WEL-93	HL-1112-193				
WEL-94	HL-1112-194				
WEL-95	HL-1112-195				
WEL-96	HL-1112-196				
WEL-97	HL-1112-197				
WEL-98	HL-1112-198				
WEL-99	HL-1112-199				
WEL-100	HL-1112-200				

- 1.) Field parameters include pH, TC, and water temperature.
- 2.) Major and minor constituents include those compounds listed in the first half of ARM 72-30-73A Table 1.
- 3.) Validity requires measurements within three times of the second half of ARM 72-30-73A Table 1.

DATA VALIDATION REPORT

1. INTRODUCTION

This validation applies to organic analytes for 24 water samples collected for the City of Helena Landfill semi-annual monitoring project during the December 2011 sampling event. The total number of samples included: ten field observations, one field duplicate, two field blanks (DI and Rinsate) and one trip blank.

All samples were submitted for volatile organic analyses, and select samples were submitted for inorganic analyses (metals and wet chemistry) as follows:

SITE CODE	SAMPLE NUMBER	WATER LEVEL	FIELD PARAMETERS ¹	METALS AND COMMONS ²	VOLATILES METHOD 8260 ³
HL-94-1R	HL-1112-100	X	X	X	X
HL-10-01	HL-1112-101	X	X	X	X
HL-10-01 DUP	HL-1112-102			X	X
HL-06-1	HL-1112-103	X	X	X	X
RINSATE BLANK	HL-1112-104			X	X
HL-99-1	HL-1112-105	X	X	X	X
HL-99-2	HL-1112-106	X	X	X	X
HL-99-3	HL-1112-107	X	X	X	X
HL-90-1	HL-1112-108	X	X	X	X
MPC-5	HL-1112-109	X	X	X	X
DI BLANK	HL-1112-110			X	X
TRIP BLANK	HL-1112-111				X
82-3	HL-1112-112	X			
EPA-1	HL-1112-113	X			
HL-90-2	HL-1112-114	X			
HL-90-3	HL-1112-115	X			
HL-94-2R	HL-1112-116	X			
HL-94-3	HL-1112-117	X			
I-1	HL-1112-118	X			
INF GALLERY	HL-1112-119	X			
MPC-1	HL-1112-120	X			
MPC-2	HL-1112-121	X			
Res #16	HL-1112-200		X	X	X
Res #5	HL-1112-201		X	X	X

- 1.) Field parameters include pH, SC, and water temperature.
- 2.) Metals and commons include those compounds listed in the first half of ARM 17.50.708 Table 1.
- 3.) Volatile organic compounds include those listed in the second half of ARM 17.50.708 Table 1.

- Validation procedures used are generally consistent with:
(Check all that apply)
 - ☒ EPA CLP National Functional Guidelines for Inorganics Data Review
 - ☒ EPA CLP National Functional Guidelines for Organic Data Review
 - ☒ Work Plan (Sampling and Analysis Plan, City of Helena Landfill Groundwater Monitoring Activities, Hydrometrics, March 2008)
- Overall level of validation:
 - ☐ Contract Laboratory Program (CLP)
 - ☒ Standard (see following notes)
 - ☐ Visual

NOTES: The review of this data includes checking all field and laboratory quality control samples; flagging for exceedances in field quality control; and calculating precision, accuracy, and completeness for both laboratory and field quality control samples.

2. DELIVERABLES

- All laboratory document deliverables were present as specified in the CLP-Statement of Work (CLP-SOW), EPA, 1993 and/or the project contract.
 - ☒ Yes (see following notes)
 - ☐ No

NOTES: The following was noted on the Workorder Receipt Checklist upon samples arrival at Energy Labs;

- Sample HL-1112-200 did not have a collection time on the sample containers -- time was used off the Chain of Custody.
- Sample HL-1112-109 had to be preserved in lab upon receipt for nitrate + nitrite as n and chemical oxygen demand with 4 ml sulfuric acid to acidity for a pH <2.
- All documentation of field procedures was provided as required.
 - ☒ Yes
 - ☐ No
- Consistency with project requirements
 - Sampling was completed in order as stated in the SAP.
 - ☒ Yes (see following notes)
 - ☐ No

NOTES: It should be noted that the wells were not sampled in the order listed in the SAP. The order of sampling was followed for all wells that do not use dedicated or disposable equipment. Any variances in sampling order were noted in the field book.

3. FIELD QUALITY CONTROL SAMPLES

- **Field blanks**

Please note that the highest blank value associated with any particular analyte is the blank value used for the flagging process.

DI, trip, rinsate, or any other field blanks have been carried out at the proper frequency.

☒ Yes

☐ No

Reported results on the field blanks are less than the contract required detection limits (CRDL) or the project required detection limits (PRDL) if project detection limits have been specified.

☐ Yes

☒ No (see the following notes)

NOTES: In field blank sample HL-1112-104 one exceedance occurred for chloroform resulting in one associated result being flagged.

- **Field duplicates**

Field duplicates have been collected at the proper frequency.

☒ Yes

☐ No

Field duplicate relative percent differences (RPD's) were within the required control limits (RPD of 20 percent or less for water matrix, 35 percent or less for soil matrix). If the sample or duplicate result is less than 5 times the PRDL, the RPD criteria are not used. In these cases, the difference between the sample and the duplicate results must be within $\pm$ the PRDL for water matrix, within $\pm$ 2 times the PRDL for soil matrix.

☒ Yes

☐ No

- **Field standards**

Field standards were sent at the proper frequency

☐ Yes

☐ No

☒ NA - Not required by the work plan.

4. **LABORATORY PROCEDURES**

- **Laboratory procedures followed**

☐ CLP-SOW

☒ SW-846

☒ Methods for Chemical Analysis of Water and Wastes

☐ XRF Standard Operating Procedures

☐ Other

- **Samples were received by the laboratory at the proper temperature**

☒ Yes

☐ No

- **Holding times met**

☐ Yes

☒ No (see the following notes)

NOTES: Energy Laboratories exceeded the holding time for pH for all samples submitted. However, as a rule holding times for laboratory pH measurements are frequently exceeded because measurements are typically not conducted "immediately",

but rather as soon as practicable. Therefore, no qualifiers are applied for lab pH holding time exceedances.

- **Consistency with project requirements**

Analyses were carried out as requested.

☒ Yes

☐ No

Project specified methods were used.

☒ Yes (see following notes)

☐ No

NOTES: It should be noted that Energy Laboratories used a different method than stated in the work plan on the following parameters: pH, SC, and cyanide. However, no associated data was flagged because the methods used are considered comparable to stated methods in work plan.

5. DETECTION LIMITS

- Reporting detection limits met project required detection limits (PRDL).

☒ Yes (see following notes)

☐ No

NOTES: It should be noted that Energy Laboratories raised the reporting limit for sulfate, nitrate + nitrite as n, and cyanide due to a sample matrix interference. The reporting limits used for dissolved antimony and thallium were lower than the requested limits, and did not seem to impact the results.

6. LABORATORY BLANKS

Please note that the highest blank value associated with any particular analyte is the blank value used for the flagging process.

- **Preparation/Method blanks**

Preparation/Method blanks were prepared and analyzed at the required frequency.

☒ Yes

☐ No

All analytes in the preparation blank were less than the CRDL (or PRDL if a project detection limit has been specified).

☒ Yes

☐ No

7. LABORATORY BLANK SPIKES

- **Blank Spikes**

Blank spikes (organics) were prepared and analyzed at the required frequency.

☒ Yes

☐ No

Blank spike recoveries were within control limits.

☒ Yes
☐ No

8. SURROGATE SPIKES

• Surrogate Spikes

Surrogate spikes were prepared and analyzed at the required frequency.

☒ Yes
☐ No

Surrogate spike recoveries were within control limits.

☒ Yes
☐ No

9. MATRIX SPIKE /MATRIX SPIKE DUPLICATES (MS/MSD)

- Matrix spike samples were analyzed at the proper frequency.

☒ Yes
☐ No

Matrix spike recoveries were within control limits.

☐ Yes
☒ No (see following notes)

- Matrix spike duplicate samples were analyzed at the proper frequency.

☒ Yes
☐ No

Matrix spike duplicate RPD's were within control limits.

☐ Yes
☒ No (see following notes)

NOTES: Both matrix spike and matrix spike duplicate samples had several QC exceedances. At this level of validation, these exceedances are only noted and no flagging of the associated data occurs.

10. INTERPARAMETER RELATIONSHIPS

- The following relationships have been checked for all data from the December 2011 monitoring:

☒ Lab SC versus field SC
☒ Lab pH versus field pH

Lab SC versus field SC: A comparison of the field and lab SCs using a percent difference (%D) criteria for evaluation purposes, showed that all of the SC pairs exceeded the ten percent comparison criteria.

Lab pH versus field pH: A comparison of the field and lab pHs using a percent difference (%D) criteria for evaluation purposes, showed that also none of the pH pairs exceeded the ten percent comparison criteria.

11. HISTORICAL COMPARISON

Current sampling event data (December 2011) were compared to historical data (December 2007 through November 2011). The data for the December 2011 sampling event was similar to historic data.

12. DATA QUALITY OBJECTIVES

- **Project data quality objectives (DQO's) met.**

☒ Yes

☐ No

Accuracy

Accuracy for this project is the agreement between a measured value and a true value and is measured by the recoveries on the laboratory matrix spikes and laboratory control samples.

Accuracy for this sampling event was 99 percent.

Precision

Precision for this project is the degree of variability between duplicate measurements. Laboratory analytical variability is measured by laboratory duplicates; field duplicates are a measure of overall variability in both field sampling and laboratory techniques.

Laboratory precision was 97 percent for this sampling event.

Field precision was 99 percent for this sampling event.

Completeness

The target completeness for this project is 90 percent of the measurements valid (not rejected). This percentage is based on the number of valid measurements compared to the number of planned measurements. Completeness for this sampling event was 100 percent.

DATA VALIDATION REPORT

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Reviewed by: Jodi Bingham, P.E.

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validation and State
Evaluation of December 2011
Groundwater Quality Data

City of Helena Landfill
Appendix A - Data Validation

February 2012


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APPENDIX B

STATISTICAL ANALYSIS REPORTS

ata Validation and Statistics
Evaluation of December 2011
Groundwater Quality Data

City of Helena Landfill

Appendix B - Statistical Analysis Reports

February 2012

Maxell



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